

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Themistocles Tsarnas, being first duly sworn, hereby depose and state as follows:

AGENT BACKGROUND

1. I am an investigative or law enforcement officer of the United States within the meaning of 18 U.S.C. § 2510(7); that is, an officer of the United States who is empowered by law to conduct investigations of, and to make arrests for, the offenses enumerated in 18 U.S.C. § 2516. I have been trained in advanced investigative techniques and have satisfied all requirements defined by the Federal Criminal Investigator Classification series established by the U.S. Office of Personnel Management.

2. I have been employed by the Federal Bureau of Investigation (hereinafter "FBI") as a Special Agent since May of 2018 and have been assigned to the Cleveland Division, Youngstown Resident Agency, since February 2019. I have been assigned and participated in investigations in the area of general criminal matters, which include bank robberies, drug violations, crimes against children, and threats of violence. I have participated in all of the usual methods of investigation including, but not limited to, financial analysis, physical surveillance, cooperating witnesses, confidential human sources, telephone toll record analysis, interception of wire and cellular telephone communications, consensual monitoring, and in the execution of search and arrest warrants.

3. Over the course of my employment as a FBI Special Agent I have conducted and participated in multiple criminal investigations that have resulted in arrests for violent criminal offenses. These crimes resulted in subsequent convictions in Federal Courts.

4. This affidavit is being submitted for the limited purpose of establishing probable cause to believe that **RONALD L. ELLIS**, age 64, currently residing at 3482 Ivy Hill Cir., Unit B, Cortland, Ohio 44410, in the Northern District of Ohio, Eastern Division, has committed a violation of Title 18, United States Code, Section 876(c) by Mailing Threatening Communications.

5. The statements contained in this Affidavit are based in part on: information provided by FBI Special Agents, Task Force Officers and FBI Analysts, written reports about this and other investigations that I have received, directly or indirectly, from other law enforcement agents, information gathered from the results of physical surveillance conducted by law enforcement agents, reporting by eye witnesses, independent investigation and analysis by FBI agents/analysts and computer forensic professionals, and my experience, training and background as a Special Agent of the FBI. Because this Affidavit is being submitted for the limited purpose of securing a Criminal Complaint, I have not included each and every fact known to me concerning this investigation. Instead, I have set forth only the facts that I believe are necessary to establish the necessary foundation for the requested Complaint.

6. This court has jurisdiction to issue the proposed warrant because it is a “court of competent jurisdiction” as defined in 18 U.S.C. § 2711. Specifically, the Court is a district court of the United States that has jurisdiction over the offense being investigated, *see* 18 U.S.C. § 2711(3)(A)(i).

BASIS FOR PROBABLE CAUSE

7. United Healthcare (hereinafter “UHC”) is a health insurance provider that offers health benefit programs and insurance plans by providing personal insurance coverage in the areas of general healthcare, dental, vision, and additional specialized healthcare. The UHC office

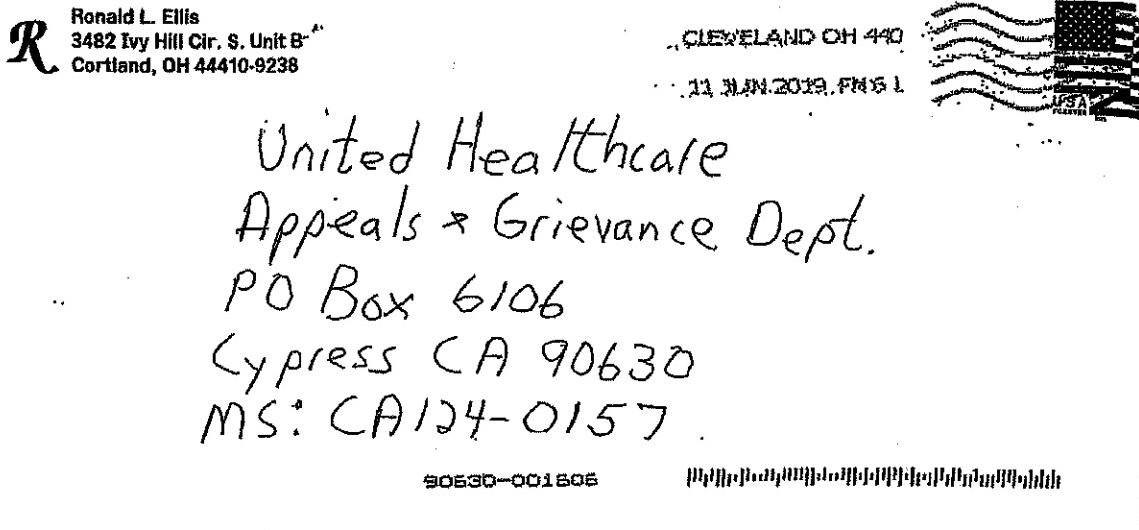
for reporting appeals and grievances is located at mailing address: United Healthcare Appeals and Grievances Department at P.O. Box 6106, MS: CA 124-0157, Cypress, CA 90630-9948.

8. On or about June 15, 2019, UHC received a letter and envelope via United States Postal Service threatening physical violence in response to a denied insurance claim from one of their clients (hereinafter the "threatening letter").

9. On or about June 18, 2019, Youngstown FBI received an electronic copy of the threatening letter and its envelope. The envelope was marked with a return name and address of "Ronald L. Ellis, 3482 Ivy Hill Cir. S Unit B, Cortland, OH 44410-9238."

10. On or about June 20, 2019, I reviewed the electronic copy of the threatening letter received by UHC.

11. The envelope stated:



13. The threatening letter stated:

DCN: 201906143220201493920008 Scan Date: 06/14/2019 10:27:09 PST

Listen to me you cock sucking, motherfucking, goddamn son of a bitching selfish, greedy money hungry leeches that feed off of the money of all human beings on this cursed, vile planet. I am formally appealing in writing this god damn mother fucking decision of yours to deny this fucking claim.

These people are trying to save what teeth I have left so that I can get by for the rest of my mother fucking sad existence on this fucking cursed planet with partial dentures.

You pay this mother fucking claim or I will personally blow up your corporate headquarters and reduce it to nothing but rubble if you do not pay this mother fucking claim you son of a bitching no-good money-hungry leeching bastards!!!!!!

Ronald Ellis

PS: I am serious as a motherfucking heart attack. I am certifiably mentally insane, extremely violent, with the worst temper on the entire planet. You have no idea in the world who or what I am. I can assure you this. I am definitely not human, but an extremely violent creature that will utterly destroy you all.

You pay this mother fucking claim or I will rain down such blind hatred, fury, and rage the likes of which you will never see again in the full extent of your further existence on this selfish, greedy, money-hungry planet you selfish, greedy money hungry leeches feeding off the money of humankind.

12. On or about June 21, 2019, I contacted UHC's Corporate Security Department.

An individual representing UHC (hereinafter "Witness-1") identified him/herself as a Certified Threat Manager in the Corporate Security of United Health Group (hereinafter "UHG"). UHC is a company of UHG that provides insurance coverage for families and individuals. Witness-1

informed me that **ELLIS** is a client of UHC and provided a member identification number for **ELLIS** and an associated address of 3482 Ivy Hill Cir. Unit B, Cortland, OH, 44410.

13. On or about June 21, 2019, Witness-1 informed me that he/she was familiar with the threatening letter and that UHC had created a “Corporate Security case” based on the letter’s contents. He/she provided documentation with additional information that stated “at this time, UHG Threat Management team perceives this letter as a threat, and was in process of bringing this matter to the attention of our full Threat Assessment Team (TAT) next week for evaluation and to determine UHG’s next steps.”

14. On or about June 21, 2019, I contacted the United States Postal Service (hereinafter “USPS”) Special Investigator Division. Investigators informed me, based on the envelope image that the envelope containing the threatening letter had been sent via USPS.

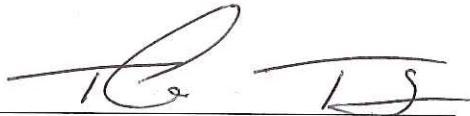
15. On or about June 21, 2019, I accompanied members of the Mahoning Valley Violent Crimes Task Force (hereinafter “MVVCTF”) and other law enforcement during the execution of a state arrest warrant of **ELLIS** at his residence at 3482 Ivy Hill Cir. S Unit B, Cortland, OH 44410-9238, which is in the Northern District of Ohio, Eastern Division. After being arrested, law enforcement advised **ELLIS** of his Miranda Rights. After verbally stating that he understood his rights, **ELLIS** stated that he sent a letter to UHC. **ELLIS** stated that he remembered writing a letter informing UHC “there’s a possibility that I could show up and blow the place up.” After being shown a copied image of the threatening letter and its accompanying envelope, **ELLIS** stated that the envelope and threatening letter shown to him were “most likely” a copy of the letter that he sent to UHC.

16. On or about June 24, 2019, I spoke with a UHG employee in the Exception Management-Appeals and Grievances Department (hereinafter “Witness-2”). Witness-2

informed me that when an insurance claim is submitted to UHC, a claims department handles individual claims such as the one **ELLIS** made. Upon receiving a denied insurance claim, a client of UHC has 60 days to request an appeal. Witness-2 stated that his/her department is tasked with reviewing the appeals and he/she is in an authoritative position within the appeals department. Witness-2 was the recipient of the threatening letter. When Witness-2 received the threatening letter he/she stated to me that it frightened him/her. Viewing the letter as a direct threat, Witness-2 forwarded the details to UHG security department.

CONCLUSION

17. Based on the foregoing, there is probable cause to believe that **ELLIS** has committed a violation of Title 18, United States Code, Section 876(c) by Mailing Threatening Communications. Accordingly, I respectfully request the court issue a warrant for the arrest of **ELLIS**.



SA Themistocles Tsarnas
Federal Bureau of Investigation

Sworn to and subscribed before me this 25 day of June 2019.



HONORABLE GEORGE J. LIMBERT
U.S. MAGISTRATE JUDGE